SOUTHERN DISTRICT OF NEW YORK	X
HUDSON PRIVATE LP,	: : Civ. Action No. 7:22-cv-05520
Plaintiff,	: :
v.	: :
CREATIVE WEALTH MEDIA FINANCE CORP.,	· :
Defendant.	: :
	: x

DECLARATION OF KEVIN FRITZ

KEVIN FRITZ, an attorney duly admitted to practice law in the State of New York and in this Court, declares pursuant to 28 U.S.C. § 1746 as follows:

- 1. I am a partner of Meister Seelig & Fein LLP (the "Firm"), attorneys for plaintiff Hudson Private Corp. ("Plaintiff"). I am fully familiar with the facts of this matter, and submit this Declaration, in support of Plaintiff's motion, pursuant to Federal Rule of Civil Procedure 56, for summary judgment.
- 2. I am familiar with the reporting and monthly billing (on a time basis) of all charges by the Firm, including its associates, paralegals, and administrative assistants, in connection with this matter. The Firm maintains a computerized time reporting, maintenance, collation, tracking and billing system and employs a full-time Director of Billing who oversees the system and prepares and renders all invoices based on contemporaneous time records. All time is recorded by the timekeepers and expenses are reported on an out-of-pocket basis, with internal costs of copying, etc., reported on an allocated basis, consistently applied among all

Invoices are rendered to clients promptly after the end of each month for the

immediately preceding month.

3. Working on this matter with me are Paul Gusak, a paralegal, and Olesya Khanas,

a paralegal.1

4. I have reviewed all time entries by each timekeeper and to the best of my

knowledge all reflect actual time expended on the matters in issue in this case. Some of the time

expended was not recorded and, therefore, not billed to the client, and is not reflected in the

amounts shown in this declaration.

5. True copies of the Firm's invoices to Plaintiff for this matter are attached as

Exhibit A. The total attorneys' fees and expenses incurred by Plaintiff, through November 30,

2022, is \$23,189.62.

Dated:

New York, NY

December 1, 2022

Respectfully submitted,

KEVIN FRITZ

/s/ Kevin Fritz

By: Kevin Fritz

MEISTER SEELIG & FEIN LLP

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¹ My professional biography is available at: <u>Kevin A. Fritz – Meister Seelig & Fein</u>.

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